

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Criminal Case No. 1:18-CR-457 (AJT)
	:	
BIJAN RAFIEKIAN, et al.	:	

**CONSENT MOTION TO CONTINUE THE APRIL 1, 2019
CIPA § 5 FILING DEADLINE**

For the reasons set forth below, Defendant Bijan Rafiekian respectfully moves the Court to continue the April 1, 2019 deadline to file notice pursuant to Section 5 of the Classified Information Procedures Act (“CIPA”). Defendant requests that this deadline be continued to April 15, 2019. Counsel for the Government consents to this motion.

On February 13, 2019, the Court directed counsel for Mr. Rafiekian to file notice of intent to disclose classified information pursuant to CIPA § 5 on or before April 1, 2019. Counsel for Mr. Rafiekian was not read-in to the necessary classifications until March 26, 2019. As a result, counsel for Mr. Rafiekian has thus far been unable to review or discuss classified matters. Counsel intends to meet with Mr. Rafiekian in a Sensitive Compartmented Information Facility during the week of April 7, 2019.

For the foregoing reasons, Mr. Rafiekian respectfully moves the Court to continue the CIPA § 5 notice deadline to April 15, 2019.

Dated: March 29, 2019

Respectfully submitted,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that, on the 29th day of March 2019, true and genuine copies of Defendant's Motion to Continue the April 1, 2019 CIPA § 5 Filing Deadline was sent via electronic mail by the Court's CM/ECF system to the following:

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